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**Coastal Carolina Riverwatch**  
700 Arendell Street, Suite 2  
Morehead City, North Carolina 28557



October 12, 2021

**Town of Beaufort**  
Planning Department  
701 Front Street  
Beaufort, NC 28516

Dear Town of Beaufort Planning Board and Board of Commissioners,

Thank you for the opportunity to submit comments regarding the proposed *Shackleford Landing* development.

We submit these comments on behalf of **Coastal Carolina Riverwatch, Sierra Club Croatian Group, Carteret County Wildlife Club, and Carteret Food and Health Council.**

Together, we represent a coalition of hundreds of Carteret County citizens, committed to protecting our local waterways. We are writing to express our strong opposition to *Shackleford Landing* development at Gibbs Creek.

We are concerned that the proposed *Shackleford Landing* development poses threats to our coastal environment and will infringe on our community's right to swim, fish, paddle, and enjoy clean waters.

The proposed location of *Shackleford Landing* sits right on Gibbs Creek, an estuarine tributary of the North River. Estuaries are the lifeblood of our coastal ecosystem.

**Estuaries perform numerous environmental services including:**

- Critical Natural Habitats for
  - Commercially important species of fish and shellfish
  - Migratory and nesting birds
  - Other native wildlife, including vulnerable and threatened species
- Physical Attributes
  - Marsh grasses and other plants reduce erosion and stabilize shorelines.
  - Estuaries provide filtration of sediment, nutrients and pollution.
  - Estuarine habitats act as natural high energy buffers by absorbing flood waters and protecting shorelines and human-built structures from storms.
- Economic Value
  - Tourism
  - Fisheries
  - Recreation

Once damaged or removed, these features of an estuary are difficult, if not impossible, to restore. With our coastline already seeing impacts from sea level rise

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and increasingly extreme weather, this should not be taken lightly and needs to be considered in long range planning and urban development decisions.

**Gibbs Creek is of tremendous importance for the following reasons:**

- **Water Quality:**
  - Under NC's Division of Water Resources Surface Water Classifications, Gibbs Creek is classified as SA, meaning it is tidal salt water that can be used for commercial shellfishing.
  - By definition, SA waters also include the following classifications:
    - HWQ, meaning Gibbs Creek is of High Water Quality and has been rated excellent based on biological and physical/chemical characteristics determined by Division monitoring or special studies.
    - SB, meaning tidal salt waters may be used for primary recreational activities involving frequent human contact such as swimming.
    - SC, meaning tidal salt waters may be used for secondary recreation involving little human contact such as boating and fishing.
  - Other creeks (Taylor and Town) in and around Beaufort, have been classified by NC as only SC class waters. It is our belief that these high water quality standards of Gibbs Creek must be preserved for fish, wildlife, and each designated use.
- **Fishing, tourism, and natural heritage:**
  - According to NC Division of Marine Fisheries' Shellfish Sanitation closure maps, Gibbs Creek is the only waterbody adjacent to Beaufort in which shellfishing has not been permanently closed. Because of this pristine water quality, Gibbs Creek serves as an important component of commercial fisheries supported by the North River.
  - According to the July 28th issue of Carteret-News Times, in 2019 the North River/Back Sound waterways landed 423,876 pounds of combined blue crab, oysters, clams, and shrimp. As an estuarine tributary to the North River, Gibbs Creek provides vital nursery, habitat, and food sources for commercial species.
  - Our local economy depends on clean, productive estuaries. This resource is vital not only for those employed by fishing industries, but also for our booming tourism industry in which fresh NC seafood is an attractive draw. In Carteret County, NC seafood is a historic and cultural value to our community.
- **Changing land use:**
  - Beaufort is in a period of great transition regarding the creation and updating of ordinances guiding development.

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- A new “Unified Development Ordinance” is underway and Beaufort's CAMA Land Use Plan is undergoing an update. These documents will guide Beaufort’s development for years to come.
  - *Shackleford Landing* would require significant changes to Beaufort’s land use zoning; as it now stands, it greatly exceeds the number of units that the current B-1 and R-20 zoning allow. Extreme increase in density is of great concern considering the environmental, economic, and cultural values of Gibbs Creek detailed above.
  - Any proposals concerning *Shackleford Landing* should not be reviewed or decided on until the project can be reviewed through the lens of updated regulatory documents.

Overall, it should be noted that Gibbs Creek is a public waterway, accessible for all North Carolinians to enjoy. As impacts to water quality become more and more prevalent across our state, it is of utmost importance to protect the resources we have.

**We respectfully request that rezoning permits for *Shackleford Landing* be denied.**

Respectfully,

Rebeca Drohan  
Waterkeeper, Coastal Carolina Riverwatch

Joel Dunn  
Chair of Croatan Group, Sierra Club

Susan A. Huntsman  
President, Carteret County Wildlife Club

Daryl Walker  
Food Waste and Recovery Program Coordinator, Carteret Food and Health Council

